

# Privacy notice for pupils

<b>Review Period</b>	Every two years
<b>Person Responsible for Policy</b>	Governance Professional
<b>Governing Committee</b>	Trust Board
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## **1. Introduction**

You have a right to be informed about how our school uses any personal data that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data. This notice explains how we collect, store and use personal data about pupils at our school, like you.

We, All Saints Multi-Academy Trust, are the 'data controller' for the purposes of UK data protection law. A member of our team is our Data Protection Officer (see 'Contact us' below).

## **2. The personal data we hold**

We hold some personal information about you to make sure we can help you learn and look after you at school. For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- your contact details;
- your test results;
- your attendance records; and
- details of any behaviour issues or exclusions.

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- information about your characteristics, like your ethnic background or any special educational needs;
- information about any medical conditions you have; and
- photographs and CCTV images.

## **3. Why we use this data**

We use the data listed above to:

- a) get in touch with you and your parents when we need to;
- b) check how you're doing in exams and work out whether you or your teachers need any extra help;
- c) track how well the school as a whole is performing; and to
- d) look after your wellbeing and keep you safe.

### **3.1 Use of your personal data for marketing purposes**

Where you have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes or services that you might be interested in. You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

### **3.2 Use of your personal data in automated decision making and profiling**

We don't currently put your personal information through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement. If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

### **4. Our lawful basis for using this data**

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this. Our lawful bases for processing your personal information for the reasons listed in section 3 above are:

- for the purposes of (a), (b), (c) and (d) above, in accordance with the 'public task' basis – we need to process data to fulfil our various statutory functions as a school;
- for the purposes of (a) and (d) above, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law; and
- for the purposes of (a) above, in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation.

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

### **4.1 Our basis for using special category data**

We only collect and use 'special category' data (more sensitive personal information) when we have both a lawful basis, as set out above, and one of the following conditions for processing (which are set out in UK data protection law):

- we have obtained your explicit consent to use your information in a certain way;
- we need to use your information under employment, social security or social protection law;
- we need to protect an individual's vital interests (*ie* protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent;
- the information has already been made obviously public by you;
- we need to use it to make or defend against legal claims;
- we need to use it for reasons of substantial public interest as defined in law;
- we need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law;
- we need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law;
- we need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- we have obtained your consent to use it in a specific way;

- we need to protect an individual's vital interests (ie protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent;
- the data concerned has already been made obviously public by you;
- we need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims;
- we need to use it for reasons of substantial public interest as defined in legislation.

## 5. Collecting this data

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily. Whenever we want to collect information from you, we make it clear if you have to give us this information (and if so, what the possible consequences are of not doing that), or if you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- local authorities, other schools, and other Trusts;
- local churches, Diocesan or Archdiocesan authorities;
- clubs or charities;
- government departments or agencies; and
- police forces, courts or tribunals.

## 6. How we store this data

We keep personal information about you while you are attending our school. We may also keep it after you leave our school if this is necessary. Our Data Retention Policy, available on request from the Trust offices or from any of our schools, sets out how long we keep information about pupils.

We have put in place appropriate security measures to stop your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We'll dispose of your personal data securely when we no longer need it.

## 7. Who we share data with

We don't share information about you with any third party without consent unless the law and our policies allow us to do so. Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you with:

- the school's Local Authority, to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions;
- other Multi-Academy Trusts and schools;
- Diocesan and Archdiocesan authorities;
- clubs and charities;
- government departments or agencies;

- youth support services providers;
- Ofsted or other regulators (such as Diocesan/Archdiocesan authorities);
- suppliers and service providers, such as caterers and ICT filtering and monitoring companies;
- financial organisations;
- our auditors;
- survey and research organisations;
- health authorities;
- security organisations;
- health and social welfare organisations;
- professional advisers and consultants;
- charities and voluntary organisations; and.
- police forces, courts, tribunals

## **National Pupil Database**

We are required to provide information about you to the Department for Education as part of statutory data collections such as the school census. Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities, exam boards and others. The Department for Education may share information from the NPD with other organisations that promote children’s education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use the data. For more information, see the Department for Education’s webpage on [how it collects and shares personal data](#). You can also [contact the Department for Education](#) if you have any questions about the NPD.

### **7.1 Transferring data internationally**

We may share personal information about you with international third parties, where different data protection rules apply. Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law. In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

## **8. Your rights**

### **8.1 How to access personal information that we hold about you**

You have a right to make a ‘subject access request’ to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will:

- give you a description of it;
- tell you, on request, why we are holding and processing it, and how long we will keep it for;
- explain where we got it from, if not from you;
- tell you who it has been, or will be, shared with;

- let you know whether any automated decision-making is being applied to the data, and any consequences of this; and
- give you a copy of the information in an understandable form unless there's a very good reason why we shouldn't.

You may also have the right for your personal information to be shared with another organisation in certain circumstances. If you would like to make a request, please contact us (see 'Contact us' below).

## 8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- say that you don't want your personal information to be used;
- stop it being used to send you marketing materials;
- say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person);
- in some cases, have it corrected if it's inaccurate;
- in some cases, have it deleted or destroyed, or restrict its use;
- withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason;
- in some cases, be notified of a data breach;
- make a complaint to the Information Commissioner's Office; and to
- claim compensation if the data protection rules are broken and this harms you in some way.

To exercise any of these rights, please contact us (see 'Contact us' below).

## 9. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

You can make a complaint to the Information Commissioner's Office by

- reporting a concern online at <https://ico.org.uk/make-a-complaint/>;
- calling 0303 123 1113; or
- writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**, Suzanne Deveney, on 0151 261 4480.